

Exhibit 139



June 21, 2019

VIA ELECTRONIC MAIL: legal@ncsbe.gov

Katelyn Love
Acting General Counsel
North Carolina State Board of Elections and Ethics Enforcement
430 N Salisbury Street
Raleigh, NC 27603

RE: Ownership of Election Systems & Software, LLC ("ES&S")

Dear Ms. Love:

ES&S is in receipt of your electronic email message, dated June 14, 2019, regarding the above-referenced matter. Pursuant to the recently modified State of North Carolina Election Systems Certification Program, the following entities and/or individuals own a 5% or greater interest or share in ES&S, any subsidiary company of ES&S, and ES&S' parent company.

- Government Systems, Software & Services, Inc. owns 100% of the membership units of Election Systems & Software, LLC

The following individuals and/or entities own 5% or more of the shares of Government Systems, Software & Services, Inc.:

- McCarthy Group, LLC
- Tom Burt
- Tom O'Brien

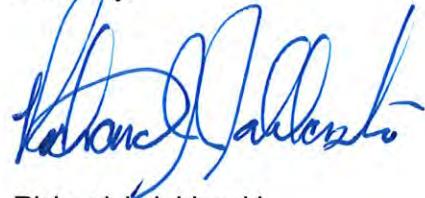
Please be advised that McCarthy Group, LLC owns a controlling interest in Government Systems, Software & Services, LLC. Neither Tom Burt nor Tom O'Brien own a controlling interest in McCarthy Group, LLC. Further, the following individuals own 5% or more of the membership units of McCarthy Group, LLC: Nancy McCarthy and Kenneth E. Stinson. Both Nancy McCarthy and Kenneth E. Stinson are passive investors in McCarthy Group, LLC.

As McCarthy Group, LLC, Government Systems, Software & Services, Inc. and ES&S are not public companies, ES&S considers the named individuals above to be proprietary and confidential information and not subject to disclosure under Section 132-1.2(1) of the North Carolina Public Records laws or any other applicable public records laws as such information is not generally known to the public and ES&S maintains reasonable efforts to maintain its secrecy. ES&S requests confidential treatment of such information and that the State of North Carolina State Board of Elections and Ethics Enforcement maintain such confidentiality and use this information for internal purposes only.

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If you have any questions or need additional information, please do not hesitate to contact me directly.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard J. Jablonski".

Richard J. Jablonski
Vice President of Finance